

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Nautilus Insurance Company,)	
)	
	Plaintiff,) C/A No. 2:22-cv-1307-RMG
Versus)	MOSS & KUHN, P.A.'S RULE 26(a)(3)
Richard Alexander Murdaugh, Sr., Cory)	PRETRIAL DISCLOSURES
Fleming, Moss & Kuhn, P.A., Chad)	
Westendorf, and Palmetto State Bank,)	
)	
	Defendants.)

The Defendant, Moss & Kuhn, P.A., (hereinafter “M&K”), by and through its undersigned attorneys, respectfully submits the following disclosures pursuant to Fed. R. Civ. Pro. 26(a)(3):

1. The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises.

In addition to Plaintiff and those witnesses identified by Plaintiff and other Defendants, and without waiving the right to call additional witnesses, M&K expects to present the following witnesses at trial:

1. Amy Coryer Miller, c/o Jaan G. Rannik, Esq.

Ms. Miller was the Nautilus claims adjuster for the insurance claim made by Defendant Murdaugh relating to the death of Gloria Satterfield.

2. Representative of Nautilus, c/o Jaan G. Rannik, Esq.

A representative of Nautilus is expected to testify about the insurance claim made by Defendant Murdaugh relating to the death of Gloria Satterfield.

3. Chad Westendorf

Mr. Westendorf served as the personal representative for the Estate of Gloria Satterfield in relation to the wrongful death claim advanced by other Defendants.

4. John Grantland

Mr. Grantland was defense counsel hired by Nautilus to defend Defendant Murdaugh in relation not the wrongful death claim advanced by other Defendants.

5. Cory Fleming, c/o Thomas A. Pendarvis, Esq.

6. H. Fred Kuhn, c/o Robert H. Hood, Jr., Esq.

M&K does not waive or limit its right to object to the presentation of any witness on grounds of competency, relevance, materiality, privilege, confidentiality, admissibility, or any other ground. M&K reserves the right to call additional witnesses not identified in these disclosures as may be necessary, including for purposes of impeachment.

2. The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony.

M&K intends to offer its witnesses live at trial, barring unforeseen circumstances preventing the same. In that event, M&K reserves the right to provide designations for that witness or those witnesses. M&K further reserves the right to provide counter-designations to any designations from Plaintiff.

3. An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

M&K intends to offer as exhibits any documents produced during the discovery phase of this matter. M&K does not waive or limit its right to offer additional exhibits or to object to any exhibit, proposed here by it or elsewhere by any party, on grounds of authenticity, competency, relevancy, materiality, privilege, confidentiality, admissibility as evidence for any purpose, or any other ground. M&K may offer as exhibits portions or enlargements of any exhibits identified in these disclosures. M&K further reserves the right to introduce into evidence any documents

produced by either party for review during discovery, documents included as exhibits to any deposition or attached as exhibits to memoranda of law filed in this action, correspondence between the parties or their counsel, any pleadings, affidavits, or documents either filed or served in this action, and any exhibit listed by any party.

M&K may also introduce into evidence illustrative demonstrative exhibits. M&K reserves the right to use additional exhibits not identified in these disclosures based on any developments that may occur during the course of the trial that were not anticipated and reserves the right to counter-designate exhibits, for completeness purposes or otherwise, based upon any other party's pretrial designations. M&K reserves the right to offer as evidence additional documents as needed for cross-examination, impeachment, or rebuttal.

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Attorneys for the Defendant Moss & Kuhn, P.A.

December 2, 2024
Charleston, South Carolina